



DEPARTMENT OF PUBLIC WORKS AND TRANSPORTATION

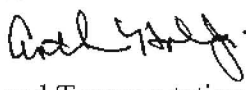
Isiah Leggett
County Executive

Arthur Holmes, Jr.
Director

MEMORANDUM

April 18, 2008

TO: Phil Alperson, Montgomery County BRAC Coordinator
Office of the County Executive

FROM: Arthur Holmes, Jr., Director 
Department of Public Works and Transportation

SUBJECT: Comments on the FEIS for Activities to Implement 2005 BRAC
at the NNMC in Bethesda, Maryland

The Montgomery County Department of Public Works and Transportation (DPWT) has completed its review of the Final Environmental Impact Statement (FEIS) for Activities to Implement 2005 Base Realignment and Closure Actions (BRAC) at the National Naval Medical Center (NNMC) in Bethesda, which was released in March 2008. While the Navy is not soliciting formal comments on this document, DPWT has prepared the following comments for your consideration in preparing a response for the County Executive. In general, DPWT reviewed the FEIS to determine the manner in which the Navy responded and addressed the comments that it made to the DEIS last January. Overall, DPWT did not find any glaring deficiencies in the FEIS and commends the Navy for preparing a thorough and responsive FEIS document.

During review of the FEIS, DPWT found that the Navy incorporated the technical corrections that we identified; however, they did not adequately address our questions on the validity of the traffic study or comments on the Transportation Demand Management (TDM) and transit incentives to reduce vehicular traffic. The Navy, instead, refers to the Maryland-National Capital Park and Planning Commission's letter on traffic scoping to deflect any criticism that we had on how the traffic study did not accurately reflect the Purple Line and the Corridor Cities Transitway or deal with transit options and how it simply referred us to the TDM Plan and Master Plan processes still to come. It remains difficult to comment further on the TDM and other issues that are not to be addressed as part of the EIS process. While the issues and concerns that DPWT noted in earlier comments on the DEIS remain valid with respect to the TDM and these other items, there is no satisfactory way for us to assess how the Navy will respond to them until they are further developed as part of the Master Plan process.

Office of the Director

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The only major change to the FEIS based on our transit comments is the statement that, "The Navy recognizes that the proposed BRAC action would constitute an unusual impact on the transportation network surrounding NNMC and is submitting a request for Defense Access Roads (DAR) Program certification for pedestrian access to the Medical Center Metro Station on the NNMC side of MD 355 and for improvements at the intersection that provide direct access into NNMC." At first reading, this statement indicates the potential for DAR program funding for the critical pedestrian underpass from the Metro Station under MD 355.

However, after further analysis it becomes clear that the certification for DAR funding is limited to only the portion of the underpass from MD 355 eastward to the NNMC property and not for the entire underpass project. While this may be a first step, it does not address the need to fully fund the project.

Many of the transit related comments were dismissed by the Navy on the premise that they were not included in the traffic scoping process and, therefore, they did not need to address them at this point. Whether or not transit comments were noted early enough to be included in the scoping process, these comments and concerns are valid and should be adequately addressed.

Finally, this BRAC action has many impacts on State and local facilities yet it remains basically a federally imposed "unfunded mandate". We recognize that there appears to be some progress towards applying Federal funding to the mitigation of some of the impacts from this action, specifically with regard to the DAR funding. However, from a transportation stand point, it is our position that BRAC action should be adequately funded by the Federal government and Department of Defense to provide direct funding for the identified off-site traffic improvements.

AH:lh